

REMARKS

Claims 2-7, 9-19, and 23-25 are pending. Claim 16 is amended to correct a minor informality. Reconsideration and allowance are respectfully requested.

Rejection of Claim 5 Under 35 U.S.C. §102(e)

The Office Action rejects claim 5 under 35 U.S.C. §102(e) as being anticipated by Muranaga (U.S. Pat. No. 6,944,464) (“Muranaga”). Applicant respectfully traverses this rejection.

Applicant submits that Muranaga does not disclose or suggest at least “the language and location database module returns at least one probable target language from the plurality of prioritized probable target language for transmission to the wireless device through a wireless network,” as recited in independent claim 5.

Muranaga discloses an emergency call system that fields emergency calls from mobile telephones, translates those calls into the local language, and relays the translation to police, medical institutions, etc. *See e.g.*, Abstract, Fig. 1, 3-6, col. 3, lines 19-34, etc. However, Muranaga only discloses sending translations to the public network 31 for distribution to the various emergency response providers. *See e.g.*, Figs. 3-6, col. 3, lines 19-34, etc. The purpose of Muranaga’s translations is to support emergency personnel that may not speak the language of the emergency caller. Muranaga does not serve provide “location-based translation services to a wireless device” and does not return “at least one probable target language from the plurality of prioritized probable target language for transmission to the wireless device through a wireless network,” as recited in independent claim 5.

Thus, Applicant asserts that independent claim 5 contains allowable subject matter. Claim 6 depends from independent claim 5 and therefore also contains allowable subject matter. Accordingly, Applicant requests that the rejection under 35 U.S.C. §102(e) be withdrawn.

Rejection of Claims 2-4, 6-7, 9-19 and 23-25 Under 35 U.S.C. §103(a)

The Office Action also rejects claims 2-4, 6-7, 9-19 and 23-25 under 35 U.S.C. §103(a) as being unpatentable over Muranaga (USP 6,944,464) in view of Kitahara, et al (U.S. Pat. 2002/0046035) (“Kitahara”). Applicants respectfully traverse this rejection.

With respect to independent claim 2, the Office Action asserts that Muranaga discloses “a network node transmitting to a wireless device a most probable language spoken at the geographical location.” *See* O.A., p. 3. For the reasons stated above with respect to independent claim 5, Applicants submit that Muranaga does not transmit translations back to the mobile terminal 10 and as such, does not disclose or suggest at least “the network node transmitting to the wireless device a target language according to the location of the wireless device,” as recited in independent claim 2.

Furthermore, contrary to the Office Action’s assertions, Kitahara et al. does not disclose or suggest that “a user be able, from a status of the device being able to generally choose applications on the wireless device, select translation services via a single input to the device and wherein the target language is preselected,” as recited by independent claim 2. In particular, the Office Action points to FIG. 5 as teaching this feature. However, FIG. 5 requires the user to provide numerous inputs to get to the selected language for translation. While viewing a table of languages to choose for translation, the user must “press[] the prescribed buttons, to which the function of the shifting cursor is assigned, to select” the chosen language. Kitahara et al. also discloses presenting a display and vertical shift buttons that a user must touch or press to select a

second language for translation. Alternately, the user must enter a telephone number that matches the desired language. Each of these approaches involves a number of user inputs to get to the desired language.

Moreover, the Office Action points to element 1 which is a telephone terminal 1, and element 101 which is a display on the telephone terminal 1 as disclosing the features of the claim. These elements do not describe Applicants' claimed invention in any way. Applicant is left only to consider what the Office Action intended.

In that regard, Kitahara et al. does not disclose or suggest selecting translation services using "a single input to the wireless device wherein the target translation language is preselected." In particular, FIG. 4 of Kitahara et al. discloses a "service menu" on display 101 which it appears that the Office Action equates to the status of being able to generally choose applications on the device. This "service menu" has several layers which teach away from Applicant's claimed "single input" process. For example, in Kitahara et al., the user must first press the prescribed buttons in the service menu until the third item "automatic interpretation" is highlighted. Then, the user presses another prescribed button to fix the selection. Then, the user may press more prescribed buttons to shift and select translation from language to language such as "Japanese-English". See, Paragraphs [0038] - [0039].

Applicant's background of the invention section even denounces cumbersome multiple menus such as those found in Kitahara et al.:

These related systems render the process of selecting and switching between target languages cumbersome. Either they disclose no efficient method of changing target languages or they require changing between frequencies or requiring a user to maneuver through a menu system to request a target language preference inhibit and complicate the use of mobile language translation system. See, para. [0008] (emphasis added).

Thus, Applicants' claimed invention clearly teaches away from Kitahara et al. and as such, Kitahara does not disclose Applicant's claimed "single input" feature.

Kitahara et al. also does not disclose the target language which is based on a location of the wireless device, as being "preselected." Kitahara et al. only discloses an initial state shown in FIG. 5, wherein an initial language to a secondary language pair is positioned at the top of the list. Thus, Kitahara et al. does not disclose how that language is selected or that a target language is preselected.

With respect to independent claim 3, Muranaga and Kitahara et al. do not disclose or suggest at least "a network node that ...transmits to the wireless device a prioritized list of a plurality of probable target languages based on the location of the wireless device, wherein when a user selects translation service on the wireless device, the most probable target language is preselected," as recited in independent claim 3 for at least the reasons set forth with respect to the assertions made regarding independent claims 2 and 5, above.

Along with the assertions above, Applicant more specifically asserts that Muranaga and Kitahara et al. do not disclose or suggest that a node that "transmits to the device a prioritized list of a plurality of target languages based on the location of the wireless device." Muranaga at best teaches that a country 30 has a single default language assigned. The Kitahara et al. listing of languages is not prioritized and is not taught as being based on a current location of the device. Kitahara et al. merely discloses sending a table to the device so that the user can select the originating language and translation language. *See*, Para. [0039]. Thus, Kitahara et al. never discloses generating the listing of languages relative to the location of the mobile device. Therefore, Applicant submits that claim 3 and dependent claim 4 are patentable and in condition for allowance.

With respect to independent claim 7, Muranaga and Kitahara et al. do not disclose or suggest at least “associating the location of the wireless device with a group of prioritized probable target languages spoken at the location and preselecting a most probable target language from the group of prioritized probable target languages, wherein when a user selects language translation services, the wireless device translates source speech into the most probable target language without further user language selection action,” as recited in independent claim 7 for at least the reasons set forth with respect to the assertions made regarding independent claims 2, 3 and 5, above. Those arguments need not be repeated here. Accordingly, Applicant asserts that independent claim 7 and claim 9 which depends from independent claim 7, contains allowable subject matter.

With respect to independent claim 10, Muranaga and Kitahara et al. do not disclose or suggest at least “associating the location of the wireless device with a group of probable target languages, transmitting data associated with the group of probable target languages to the wireless device, and prioritizing the probable target languages in a menu system on the wireless device, such that when a user selects a translation services application from a general application choice status, a most probable target language is preselected,” as recited in independent claim 10 for at least the reasons set forth with respect to the assertions made regarding independent claims 2, 3 and 5, above. Those arguments need not be repeated here. Accordingly, Applicant asserts that independent claim 10 and claims 11-14 which depend from independent claim 10 contain allowable subject matter.

With respect to independent claim 15, Muranaga and Kitahara et al. do not disclose or suggest at least “receiving a group of prioritized target languages based on the location of the wireless device, and prioritizing the group of target languages in a menu system on the wireless device, such that when a user desires language translation for the target language, the user selects

a translation service application from a general application choice status, and a most probable target language is preselected,” as recited in independent claim 15 for at least the reasons set forth with respect to the assertions made regarding independent claims 2, 3 and 5, above. Those arguments need not be repeated here. Accordingly, Applicant asserts that independent claim 15 contains allowable subject matter.

With respect to independent claim 16, Muranaga and Kitahara et al. do not disclose or suggest at least “receiving a group of probable languages spoken based on the location of the wireless device, prioritizing the probable languages in a menu system on the wireless device, and upon receiving a single click request for translation service from a user, presenting an interactive dialog window for translation services for a most probable language,” as recited in independent claim 16 for at least the reasons set forth with respect to the assertions made regarding independent claims 2, 3 and 5, above. Those arguments need not be repeated here. Accordingly, Applicant asserts that independent claim 16 contains allowable subject matter.

With respect to independent claim 17, Muranaga and Kitahara et al. do not disclose or suggest at least “receiving via a wireless connection at the wireless device a group of prioritized probable languages spoken according to the location of the wireless device, updating a language translation menu according to the group of prioritized probable languages spoken, and upon a single click request from a user, presenting the user with a dialogue window for translation services for a most probable language spoken from the group of prioritized probable languages spoken,” as recited in independent claim 17 for at least the reasons set forth with respect to the assertions made regarding independent claims 2, 3 and 5, above. Those arguments need not be repeated here. Accordingly, Applicant asserts that independent claim 17 and claim 18 which depends from independent claim 17 contain allowable subject matter.

With respect to independent claim 19, Muranaga and Kitahara et al. do not disclose or suggest at least “transmitting the group of probable target languages to the wireless device located in one of the cell sites associated with the network node, prioritizing the group of probable target languages in a menu system on the wireless device, and upon receiving a translation request from a user from a general application choice status of the wireless device, presenting the user with a translation dialogue window pre-selected for the most probable language of the group of probable languages,” as recited in independent claim 19 for at least the reasons set forth with respect to the assertions made regarding independent claims 2, 3 and 5, above. Those arguments need not be repeated here. Accordingly, Applicant asserts that independent claim 19 contains allowable subject matter.

With respect to independent claim 23, Muranaga and Kitahara et al. do not disclose or suggest at least the use of “a first window” and “a second window” in the translation process. Maranaga and Katahari et al. disclose the use two windows to provide the translation interaction with users. Accordingly, Applicant asserts that independent claim 23 and dependant claims 24 and 25 which depend from independent claim 23 contain allowable subject matter.

Thus, in view of the assertions above, Applicant asserts that independent claims 2, 3, 7, 10, 15, 16, 17, 19, and 23 contain allowable subject matter. Claims 4, 9, 11-14, 18, and 22-25 depend from independent claims 2, 3, 7, 10, 15, 16, 17, 19, and 23 and therefore also contain allowable subject matter. Accordingly, Applicant requests that the rejection under 35 U.S.C. §103(a) be withdrawn.

CONCLUSION

Having addressed the rejection of claims 2-7, 9-19, and 23-25, Applicants respectfully submit that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,

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By: /Ronald E. Prass, Jr./

Correspondence Address:
Samuel H. Dworetsky
AT&T Corp.
Room 2A-207
One AT&T Way
Bedminster, NJ 07921

Ronald E. Prass, Jr.
Attorney for Applicants
Reg. No. 42,083
Phone: 410-286-9405
Fax No.: 410-510-1433